

1 PHILLIP A. TALBERT  
United States Attorney  
2 KEVIN C. KHASIGIAN  
Assistant U. S. Attorney  
3 501 I Street, Suite 10-100  
Sacramento, CA 95814  
4 Telephone: (916) 554-2700

5 Attorneys for the United States  
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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$25,000.00 IN  
U.S. CURRENCY,

15 Defendant.  
16

CASE NO. 1:22-MC-00035-JLT

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant Jesus  
18 Pedro Maldonado Ceja ("claimant"), by and through their respective counsel, as follows:

19 1. On or about December 1, 2021, claimant Maldonado Ceja filed a claim in the  
20 administrative forfeiture proceedings with the Federal Bureau of Investigation with respect to the  
21 Approximately \$25,000.00 in U.S. Currency (hereafter "defendant currency"), which was seized on  
22 September 2, 2021.

23 2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required  
24 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a  
25 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the  
26 claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture  
27 proceeding.

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1           3.       Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
2 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
3 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative  
4 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of the  
5 parties. That deadline was March 1, 2022.

6           4.       By Stipulation and Order filed March 4, 2022, the parties stipulated to extend to May 2,  
7 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
8 defendant property and/or to obtain an indictment alleging that the defendant property is subject to  
9 forfeiture.

10          5.       By Stipulation and Order filed April 26, 2022, the parties stipulated to extend to July 31,  
11 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
12 defendant property and/or to obtain an indictment alleging that the defendant property is subject to  
13 forfeiture.

14          6.       As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
15 to September 29, 2022, the time in which the United States is required to file a civil complaint for  
16 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
17 currency is subject to forfeiture.

18          7.       Accordingly, the parties agree that the deadline by which the United States shall be  
19 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
20 alleging that the defendant currency is subject to forfeiture shall be extended to September 29, 2022.

21 Dated: July 29, 2022

PHILLIP A. TALBERT  
United States Attorney

23                   /s/ Kevin C. Khasigian  
24 KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

26 Dated: July 28, 2022

27                   /s/ Robert L. Forkner  
ROBERT L. FORKNER  
Attorney for potential claimant  
Jesus Pedro Maldonado Ceja  
(As approved by email on 7/28/22)

1  
2 IT IS SO ORDERED.

3 Dated: **July 29, 2022**

  
UNITED STATES DISTRICT JUDGE